

Jahan C. Sagafi (Cal. Bar No. 224887)
OUTTEN & GOLDEN LLP
One California Street, 12th Floor
San Francisco, CA 94111
Telephone: (415) 638-8800
Facsimile: (415) 638-8810
E-mail: jsagafi@outtengolden.com

P. David Lopez (*pro hac vice*)
Peter Romer-Friedman (*pro hac vice*)
Pooja Shethji (*pro hac vice*)
OUTTEN & GOLDEN LLP
601 Massachusetts Ave. NW
Second Floor West
Washington, DC 20001
Telephone: (202) 847-4400
Facsimile: (646) 952-9114
E-mail: pdl@outtengolden.com
E-mail: prf@outtengolden.com
E-mail: pshethji@outtengolden.com

Patricia Shea (*pro hac vice*)
Katherine A. Roe (*pro hac vice*)
COMMUNICATIONS WORKERS
OF AMERICA
501 3rd Street, N.W.
Washington, DC 20001
Telephone: (202) 434-1100
E-mail: pats@cwa-union.org
E-mail: aroe@cwa-union.org

Adam T. Klein (*pro hac vice*)
OUTTEN & GOLDEN LLP
685 Third Avenue, 25th Floor
New York, NY 10017
Telephone: (212) 245-1000
Facsimile: (646) 509-2060
E-mail: atk@outtengolden.com

Attorneys for Plaintiffs and the Proposed Plaintiff Class and Collective

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

COMMUNICATIONS WORKERS OF
AMERICA, LINDA BRADLEY, MAURICE
ANSCOMBE, LURA CALLAHAN,
RICHARD HAYNIE, and others similarly
situated.

Plaintiffs,

V.

T-MOBILE US, INC., and AMAZON.COM, INC..

Defendants.

Case No. 17-cv-07232-BLF

**STIPULATION AND [PROPOSED]
ORDER REGARDING
SUPPLEMENTAL DECLARATION**

Date: January 16, 2020

Time: 9:00 a.m.

Courtroom: San Jose Courthouse, Rm 3

Judge: Hon. Beth L. Freeman

1 Pursuant to Civil Local Rule 7-12, Plaintiffs Communications Workers of America, Linda
 2 Bradley, Maurice Anscombe, Lura Callahan, and Richard Haynie, and Defendants T-Mobile US, Inc.
 3 and Amazon.com, Inc. (collectively, "the Parties") hereby stipulate to, and request that the Court enter
 4 an order, granting Plaintiffs leave to file a supplemental declaration in support of Plaintiffs' Opposition
 5 to Defendants' Motion to Dismiss. Although Defendants do not object to Plaintiffs' submission of the
 6 supplemental declaration, Defendants hereby reserve all other rights, including but not limited to the right to
 7 object to the relevance, accuracy, admissibility, or authenticity of the declaration.

8 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED THAT, Plaintiffs shall be
 9 granted leave to file a supplemental declaration in support of their Opposition to Defendants' Motion to
 10 Dismiss.

11 Dated: November 1, 2019

12 Respectfully submitted,

13 /s/ Peter Romer-Friedman
 14 P. David Lopez (*pro hac vice*)
 15 Peter Romer-Friedman (*pro hac vice*)
 16 Pooja Shethji (*pro hac vice*)
 17 OUTTEN & GOLDEN LLP
 18 601 Massachusetts Ave. NW
 19 Second Floor West
 20 Washington, DC 20001
 21 Telephone: (202) 847-4400
 22 Facsimile: (646) 952-9114
 23 Email: pdl@outtengolden.com
 24 Email: prf@outtengolden.com
 25 Email: pshethji@outtengolden.com

26
 27
 28 Jahan C. Sagafi (Cal. Bar No. 224887)
 29 OUTTEN & GOLDEN LLP
 30 One Embarcadero Center, 38th Floor
 31 San Francisco, CA 94111
 32 Telephone: (415) 638-8800
 33 Facsimile: (415) 638-8810
 34 Email: jsagafi@outtengolden.com

1 Adam T. Klein (*pro hac vice*)
2 OUTTEN & GOLDEN LLP
3 685 Third Avenue, 25th Floor
4 New York, NY 10017
5 Telephone: (212) 245-1000
6 Facsimile: (646) 509-2060
7 Email: atk@outtengolden.com

8
9
10 Patricia Shea (*pro hac vice*)
11 Katherine A. Roe (*pro hac vice*)
12 COMMUNICATIONS WORKERS
13 OF AMERICA
14 501 3rd Street, N.W.
15 Washington, DC 20001
16 Telephone: (202) 434-1100
17 Email: pats@cwa-union.org
18 Email: aroe@cwa-union.org

19
20 *Attorneys for Plaintiffs and Proposed*
21 *Plaintiff Class and Collective*

22
23 /s/ Jason C. Schwartz
24 Jason C. Schwartz (*pro hac vice*)
25 Joshua S. Lipshutz (Cal. Bar No. 242557)
26 Greta B. Williams (Cal. Bar No. 267695)
27 Anna M. McKenzie (*pro hac vice*)
28 Naima L. Farrell (*pro hac vice*)
GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036
Telephone: (202) 955-8500
Facsimile: (202) 467-0539
Email: jschwartz@gibsondunn.com
Email: jlipshutz@gibsondunn.com
Email: gwilliams@gibsondunn.com
Email: amckenzie@gibsondunn.com
Email: nfarrell@gibsondunn.com

29
30 Rachel S. Brass (Cal. Bar No. 219301)
31 GIBSON, DUNN & CRUTCHER LLP
32 555 Mission Street, Suite 3000
33 San Francisco, CA 94105
34 Telephone: (415) 393-8200
35 Facsimile: (415) 393-8306
36 Email: rbrass@gibsondunn.com

37
38 *Attorneys for Amazon.com, Inc.*

/s/ Stephen M. Rummage
Stephen M. Rummage (*pro hac vice*)
Cyrus E. Ansari (*pro hac vice*)
DAVIS WRIGHT TREMAINE LLP
920 Fifth Avenue, Suite 3300
Seattle, WA 98104-1610
Telephone: (206) 757-8136
Facsimile: (206) 757-7136
Email: steverummage@dwt.com
Email: cyrusansari@dwt.com

Jeffrey S. Bosley (Cal. Bar No. 167629)
DAVIS WRIGHT TREMAINE LLP
500 Montgomery Street, Suite 800
San Francisco, CA 94111-6533
Telephone: 415.276.6500
Facsimile: 415.276.6599
Email: jeffbosley@dwt.com

Attorneys for T-Mobile US, Inc.

1 **PURSUANT TO THE STIPULATION, IT IS SO ORDERED.**
2
3 Dated: _____
4 The Honorable Beth Labson Freeman
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ATTESTATION OF SIGNATURE

Pursuant to Civil Local Rule 5-1(i)(3), the filer of this document attests that concurrence in the filing of this document has been obtained from the other signatory above.

Dated: November 1, 2019

/s/ Peter Romer-Friedman

Peter Romer-Friedman